

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S RESPONSE TO SINGULAR COMPUTING LLC'S
REQUEST FOR A STATUS CONFERENCE REGARDING DISCOVERY DISPUTE**

Defendant Google LLC (“Google”) respectfully submits that the request by Plaintiff Singular Computer LLC (“Singular”) for a status conference to resolve a discovery dispute is premature. Dkt. No. 150. Google disagrees with Singular’s recounting of the relevant events leading to the parties’ present discovery impasse but believes it would be more efficient for the parties to address their disagreements in briefing related to Google’s forthcoming motion for a protective order. As Singular is aware, Google is currently preparing that motion and will file it no later than early next week. Google’s motion will address in detail the issues raised in Singular’s request for a status conference, as well as Google’s positions on the underlying disputes. Google believes that conducting a status conference prior to the completion of briefing on Google’s forthcoming motion would be an inefficient use of the Court’s time, and that the parties and the Court will be better positioned to address these issues once they have been fully briefed. Google is, however, available for such a conference should the Court deem it necessary.

Respectfully submitted,

Dated: March 25, 2021

By: /s/ Nathan R. Speed

Gregory F. Corbett (BBO #646394)
gregory.corbett@wolfgreenfield.com
Nathan R. Speed (BBO # 670249)
nathan.speed@wolfgreenfield.com
Elizabeth A. DiMarco (BBO #681921)
elizabeth.dimarco@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Fax: (617) 646-8646

Asim Bhansali (*pro hac vice*)
abhansali@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111

Matthias Kamber (*pro hac vice*)
mkamber@keker.com
KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809

Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed